

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. 3:25-cv-00417-HTW-LGI
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING,
MISSISSIPPI COMMUNITY COLLEGE
BOARD, MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,

Defendants.

DECLARATION OF A MEMBER OF MISSISSIPPI ASSOCIATION OF EDUCATORS

Pursuant to 28 U.S.C. § 1746, Member B of the Mississippi Association of Educators (MAE) makes the following declaration under penalty of perjury:

1. I, the undersigned, submit this declaration anonymously due to fear of retaliation, harassment, or other adverse consequences. All information contained herein is true to the best of my knowledge and personal experience.
2. I am a white teacher currently employed as an English teacher at a Jackson Public School in Jackson, Mississippi.
3. I have been a teacher for several years and have exclusively taught students of color throughout my entire teaching career.

4. I am a member of the Mississippi Association of Educators (MAE), which is affiliated with the National Education Association (NEA). MAE provides a variety of support for teachers like me, including legal assistance, liability insurance, lobbying on behalf of educators, and professional development resources.
5. In my classroom, I strive to engage my students in rigorous and relevant literature that reflects their identities, challenges their thinking, and supports their intellectual and emotional development. I currently teach several novels and materials that would likely be banned under policies similar to those recently enacted in Madison County.
6. For example, I choose to teach *American Born Chinese*, which addresses issues of identity, race, and cultural conflict. Though Mississippi State standards for English do not require certain texts, this book has been banned in other districts and would likely not be permitted under similar guidelines.
7. I also teach *The Giver* by Lois Lowry, a widely respected and commonly assigned middle school novel. It explores themes of government control, memory, and human emotion, and includes a brief mention of sexual matters. It too has been subject to bans.
8. These novels are not supplemental material—I use them as part of my required curriculum. Any mandate that prohibits these books would necessitate major changes to my teaching plan and the textbooks I rely on.
9. I also teach *The Surrender Tree* by Margarita Engle, a verse novel about a Cuban slave rebellion. The historical content in this book—central to understanding freedom movements—would likely be challenged under new content restrictions.
10. Additionally, I have taught work by Kiese Laymon, including the short story *Quick Feet*, which includes a scene in which a student character uses the phrase “fuck you white n**.” I understand that some may view this content as inappropriate, but I use it as a springboard for serious, guided discussions on race, language, and power.

11. I work in a context where nearly all of my students are Black or children of color. I believe that culturally relevant pedagogy is essential to meeting their needs and fostering their growth.
12. Over the years, I have sought out extensive professional development, specifically focused on how to be a more effective and thoughtful educator as a white person teaching in a predominantly Black school. Much of that training could be prohibited under vague or broad anti-DEI restrictions.
13. If these restrictions were implemented, I would likely be limited to teaching test-preparation drills or sanitized content that has no relevance to my students lived experiences. I believe this would devastate their interest in learning and reduce my classroom to a mechanical, ineffective space.
14. I currently display a trans pride flag in my classroom as a sign of support and inclusivity for LGBTQ+ students. I would be required to take it down under proposed regulations. Removing that flag would send a harmful and exclusionary message to my students.
15. If I had to comply with such restrictions, I would essentially be forced to teach only the narrowest type of literature.
16. My students are genuinely interested in themes like race, ethics, and morality. They are highly engaged when we explore material that connects to the world they live in. The proposed changes would silence those conversations and erase the issues most relevant to their lives.
17. Our district recently adopted an online textbook platform called StudySync, which contains progressive and inclusive materials that my students enjoy. If these policies are enforced, I fear the district will have to walk back this progress and adopt duller, less inclusive alternatives.
18. I affirm that if the proposed changes are enacted, it would fundamentally change everything about how I teach. The joy, relevance, and power of my classroom would be stripped away, and the students would be the ones to suffer most.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 18, 2025

Member B
Member B of MAE